## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,	X :
Plaintiff,	: :
-against-	: Criminal No. 1:19-cr-10080-NMG
DAVID SIDOO, ET AL,	: :
Defendant.	:
	· :
DAVID SIDOO, ET AL,	: Criminal No. 1:19-cr-10080-NN : : : : : :

# NONPARTY UNIVERSITY OF SOUTHERN CALIFORNIA'S MOTION FOR LEAVE TO FILE REPLY BRIEF UNDER SEAL

Nonparty University of Southern California ("USC") hereby moves the Court for leave to file under seal a Reply Brief in Support of its Motion to Quash ("the Motion") pursuant to Local Rule 7.1(b)(3). In support of this request, USC states as follows:

- USC filed its 20 page Memorandum in support of the Motion under seal on April 17,
   2020, and Defendants filed their 20-page Opposition under seal on April 28, 2020.
- In order to adequately address the voluminous arguments and factual averments that the
  Defendants have made in their Opposition, USC seeks leave of this Court to file a Reply
  of no more than 10 pages on or before Monday, May 4, 2020.
- 3. USC contends that the privacy interests of its students and applicants that are at issue in this litigation are paramount and deserving of the Court's consideration.
- Because the subpoena and pleadings concerning it have been sealed (Dkt. 1082, 1106)
   USC further seeks permission to file its Reply under seal as well.

WHEREFORE, USC requests that the Court grant it leave to file a Reply of no more than 10 pages on or before May 4, 2020.

### **CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(a)(2)**

Undersigned counsel hereby certifies that counsel for USC inquired on April 29 and 30, 2020 if the Defendants would assent to this motion but Defendants did not respond.

Respectfully submitted, UNIVERSITY OF SOUTHERN CALIFORNIA, By its attorneys,

#### <u>/s/ Debra Wong Yang</u>

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#### /s/ Anthony E. Fuller

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Dated: April 30, 2020